

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CLAUDE GALLAND, VIOLAINE GALLAND,  
PARISTUDIOS,

Plaintiffs,

: **Civil Action No.: 14 CV 4411**  
(RJS) (RLE)

-against-

: **INITIAL REQUEST FOR**  
**PRODUCTION**

JAMES JOHNSTON, JUDITH JOHNSTON,  
STEPHEN BOWDEN, TERRI BOWDEN,

Defendants.

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**PLEASE TAKE NOTICE** that defendants Stephen Bowden and Terri Bowden, by their attorneys Herzfeld & Rubin, P.C., hereby request, pursuant to Rule 34 of the Federal Rules of Civil Procedure, that you produce for discovery, inspection and/or copying, the documents and tangible things described below, at the below listed address, within thirty (30) days of the date hereof. For each item requested, you are required to provide a written response indicating whether the requested inspection and related activities will be produced as requested, or stating an objection to the request, if any, and the reason(s) for same.

1. Please provide copies of plaintiffs' tax returns together, together with copies all schedules, with respect to tax identification number 13-3946314, for tax years 2012 through present.
2. Please provide a list of the names and addresses of all individuals, families, companies and/or organizations that rented and/or stayed at plaintiffs' property located at 22 Rue St Severin, 75005 Paris, France for the period of January 2013 through and including the present.
3. Please provide a list of the names and addresses of all individuals, families, companies and/or organizations, if any, that reserved and canceled their

reservations to stay at plaintiffs' property located at 22 Rue St Severin, 75005 Paris, France for the period of January 2013 through and including the present.

4. Please provide copies of all rental agreements for plaintiffs' property located at 22 Rue St Severin, 75005 Paris, France for the period of January 2013 through and including the present.
5. Please provide copies of the annual reports and/or statements and records, and budgets for the property located at 22 Rue St Severin, 75005 Paris, France, including, but not limited to the cost of administration, property expenses, taxes, energy costs, capital equipment and/or improvements, telecommunications, maintenance, supplies, utilities, payroll and marketing, and any and all other expenses, for said property, for the period including January 2013 through the present.
6. Please provide the name, address and telephone number of the bank(s), credit union(s) and/or other financial institution(s), as well as the account number(s) for same, where plaintiffs' deposited rental fees obtained in connection with the rental of the property located at 22 Rue St Severin, 75005 Paris, France for the period of January 2013, through and including the present.
  - a. Please also provide copies of the bank statements and/or statements of account for the period of January 2013, through and including the present, for each of the banks, credit unions and financial institutions identified.

Defendants Stephen Bowden and Terri Bowden hereby reserve their right to amend and/or supplement this request at any time up to the time of trial.

Dated: New York, New York

October 27, 2015

HERZFELD & RUBIN, P.C.

By: *Joseph E. Donat*

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